

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>, Debtors.¹</div>	<div>PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, Debtor.</div>	<div>PROMESA Title III No. 17 BK 3567-LTS Re ECF Nos.: 12569, 12570, 12964</div>
<div>THE COMMONWEALTH OF PUERTO RICO and PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, Movants, -v- AMBAC ASSURANCE CORPORATION, Respondent.</div>	<div>PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)</div>

**MOTION OF FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR LEAVE
TO RELY ON SPANISH LANGUAGE AUTHORITY**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA,” and collectively with the Commonwealth, the “Debtors”), as Title III debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ sole representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),² hereby submits this motion requesting the entry of an order, substantially in the form of **Exhibit A** hereto (the “Proposed Order”), granting leave to rely on Spanish-language authority in connection with the Reply (as defined below) filed on May 27, 2020, and in support thereof, respectfully alleges and prays as follows:

1. On May 27, 2020, the Oversight Board filed its *Reply in Support of Motion of Financial Oversight and Management Board Pursuant to Bankruptcy Code Sections 105(a) and 362 for Order Directing Ambac to Withdraw Complaint*, Case No. 17 BK 3283-LTS [ECF No. 13251] and Case No. 17-BK 3567-LTS [ECF No. 822] (the “Reply”).

2. In support of the arguments raised in the Reply, the Oversight Board cited page 171 of Diez-Picazo y Guillón, *Sistema de Derecho Civil*, 6th ed. rev., Madrid, Ed. Tecnos, 1992, Vol. II, which had not been translated into English (the “Spanish-Language Authority”). Due to time constraints, the Commonwealth was unable to obtain certified English-language translations of the relevant excerpt of the Spanish-Language Authority from the original Spanish language prior to the filing. Accordingly, the Oversight Board attaches as **Exhibit B** hereto a certified English translation of the relevant excerpt of the Spanish-Language Authority, pursuant to Local District Court Rule 5(g).

² PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

WHEREFORE, the Commonwealth respectfully requests the Court enter the Proposed Order, attached hereto as **Exhibit A**, permitting it to rely on the Spanish-Language Authority and accepting the certified English-language translation of the Spanish-Language Authority attached hereto, and granting such other and further relief as is just and proper.

Dated: May 29, 2020
San Juan, Puerto Rico

Respectfully submitted,

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